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Defendant LYMI Inc.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

LYMI Inc.,  
Plaintiff,  
v.  
Few Moda, Inc.,  
Defendant.

Case No. 2:24-cv-4564-GW-RAO

**Declaration of Justin Thiele in  
Support of Joint Stipulation to  
Modify Scheduling Order**

Judge: Hon. George H. Wu

Few Moda, Inc.,  
Counterclaimant,  
v.  
LYMI Inc.,  
Counterclaim-Defendant.

I, Justin P. Thiele, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am Counsel at Hanson Bridgett LLP, attorneys of record for Plaintiff and Counterclaim-Defendant LYMI Inc.. I have personal knowledge of the facts set forth herein,

1 except as to those stated on information and belief and, as to those, I am informed  
2 and believe them to be true. If called as a witness, I could and would competently  
3 testify to the matters stated herein.

4       2.       Since the Court entered the Scheduling Order and discovery opened in  
5 this matter, the Parties have exchanged discovery requests. In particular,  
6 Reformation served interrogatories and requests for production on January 17, 2025;  
7 Defendant and Counterclaimant Few Moda Inc. (“Few Moda”) timely served  
8 written responses on February 18, 2025; and the Parties have met and conferred  
9 regarding Few Moda’s responses and document production. Few Moda served  
10 interrogatories and requests for production on March 4, 2025.

11       3.       Since the Court entered the Scheduling Order and discovery opened in  
12 this matter, the Parties have exchanged discovery requests. In particular, Plaintiff  
13 and Counterclaim-Defendant LYMI Inc. (“Reformation”) served interrogatories and  
14 requests for production on January 17, 2025; Few Moda timely served written  
15 responses on February 18, 2025, which included materials concerning Few Moda’s  
16 sales of the allegedly infringing items; and the Parties have met and conferred  
17 regarding Few Moda’s responses and document production. Few Moda served  
18 interrogatories and requests for production on March 4, 2025.

19       4.       The Parties have previously discussed settlement prior to the opening  
20 of the discovery in this case. The Parties have agreed to mediate at this juncture and  
21 are in the process of selecting a mediator and the date and location for mediation.  
22 The Parties anticipate engaging in mediation by the Court’s existing June 9, 2025  
23 deadline.

24       5.       The Parties agree that good cause exists for a 60-day continuance of  
25 certain dates in the Court’s Scheduling Order because such a continuance will  
26 enable the Parties to timely complete discovery, conduct expert work and exchange  
27 expert reports, engage in mediation, and pursue meaningful settlement discussions.  
28

6. Aside from the Parties' previous stipulation to allow Few Moda's corrected re-filing of its Amended Answer and Counterclaim, the Parties have not previously requested any modification of trial and pretrial dates in this case.

7. I have specifically discussed the matters in this declaration with counsel for Few Moda, and the Parties are in agreement that good cause exists for this modification of the Court's Scheduling Order.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 14th day of March, 2025, at Los Angeles, California.

/s/ Justin Thiele  
Justin P. Thiele